



February 11, 2008

Comments to Federal Trade Commission Regarding

Environmental Guides, Carbon Offsets and Renewable Energy Certificates

To Whom It May Concern:

Carbonfund.org is pleased to provide our comments on the Environmental Guides as well as carbon offsets and renewable energy certificates.

Carbonfund.org is a non-profit organization leading the fight against climate change by making it easy and affordable for any individual or business to reduce their climate impact by supporting third-party verified reforestation and clean energy projects that offset carbon emissions. Carbonfund.org is working with tens of thousands of individuals and over 600 corporate partners to lead this effort. Their support is helping drive demand up and costs down for clean energy so one day it will cost less than dirty energy. Our goal is to reduce carbon emissions and help lead the transformation to a clean energy future.

Environmental Guides

The Environmental Guides have worked extremely well over the last decade, providing a recognized set of rules for how organizations may make claims regarding the environmental impact of their decisions. The Guides, combined with the myriad third-party certification bodies, have provided marketers with a common set of principles, definitions, and oversight to ensure the credibility of offsets and to let our supporters know what is being done on their behalf.

Given the explosive growth in green products and services, and their importance to our environment, Carbonfund.org supports the FTC review of the Guides and encourages the third-party certifiers to work closely with the FTC in the review process.

Carbon Offsets and Renewable Energy Certificates

The hallmark of quality for a carbon offset or renewable energy certificate is the third-party verification. Third party verification answers the essential questions about a given greenhouse gas reduction: Is It Real and Who Says So? Much has been written by a few critics but, interestingly, these critics typically do not accept or denounce the certification bodies themselves. It is important for policy makers, regulators and the media to understand and recognize the broad-support and sheer number of government bodies, organizations and experts that support the various types of carbon offsets.

Renewable energy, for instance, is either certified or accepted by the United Nations Framework Convention on Climate Change, US EPA Green Power Program and E-Grid, Center for Resource Solutions Green-e Program, Environmental Resources Trust, Gold Standard, Chicago Climate Exchange, and many state renewable portfolio standards.

These groups have recognized the essential role played by supporting renewable energy to reduce the need for electricity produced from dirty sources such as coal.

Energy efficiency and carbon credits, which include industrial efficiency upgrades and carbon credits, are either certified or accepted by the UNFCCC, European Union, Chicago Climate Exchange, Environmental Resources Trust, Voluntary Carbon Standard, Green-e Climate, and Gold Standard.

Reforestation or sequestration projects are accepted or certified by the UNFCCC, Chicago Climate Exchange, European Union, Voluntary Carbon Standard, Climate Community and Biodiversity Standard, Environmental Resources Trust, Green-e Climate, the Department of Energy, US Fish & Wildlife Service and US Forest Service. The World Bank, for instance, is spending hundreds of millions of dollars on avoided deforestation projects globally. Reforestation projects are the only type of carbon offset that actually reduces CO₂ in the atmosphere today, rather than avoiding new emissions.

These third-party organizations have behind them hundreds of supporting organizations, government bodies and agencies and literally thousands of experts. Indeed, regulators and skeptics should consider the companies and claims made by companies that do not use accepted third-party standards.

Even the concept of additionality has broad-based support for its definition and is addressed by every certification body. The US EPA's definition is similar to most bodies and requires projects that are beyond business-as-usual, reductions from a baseline, not capped, not double counted, linked to reductions, documented, verified by third-parties, and permanent.

Lastly, we would like to acknowledge the role played by the U.S. Forest Service and comments retracted by Ms. Cundiff. In fact, the USFS regularly accepts outside reforestation funding from organizations, including American Forests, National Forest Foundation and others; many lands are not "re-establishing naturally;" and the USFS has its own carbon offset program (www.carboncapitalfund.org) to "support projects on U.S. Forest Service land, which are designed specifically to offset carbon dioxide emissions."

Conclusion

Carbon offsets and renewable energy are an essential means to address and solve climate change and the only way an individual or company can achieve carbon neutrality. They are real, certifiable and, most importantly, are working today to reduce the threat of climate change. They are accepted by governments, including the US Government, states and organizations; supported by certification programs developed by world-class organizations; generating substantial investments in new projects and technologies; and increasing demand and investment and hastening the market transformation to a low-carbon future.

Sincerely,

Eric M. Carlson
Executive Director